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Corporation

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

Kimberly Brennan, an individual; Carmen  
Ponce, an individual,

Plaintiffs,

v.

Johnny Hernandez, an individual; Crete  
Carrier Corporation, an Arizona foreign  
for-profit corporation; John and Jane Does  
1-10; and White Partnerships 1-10;,,

Defendants.

No. 2:24-cv-01740-PHX-DJH

(Consolidated with 2:24-cv-01741-DGC)

**MOTION TO EXTEND CASE  
DEADLINES**

Robert Warix, Individually,

Plaintiff,

v.

Johnny Hernandez and Jane Doe  
Hernandez, Individually and as Husband  
and Wife; Crete Carrier Corporation, a  
Foreign For-Profit Corporation; John  
Does I-X and Jane Does I-X, Individually  
and as Husband and Wife; Black  
Corporations I-X and White Limited  
Partnerships I-X,

Defendants.

The Parties, by and through undersigned counsel, hereby stipulate and respectfully request that the Court extend the remaining deadlines imposed in the Rule 16 Scheduling Order [Doc. 25] approximately 90 days. This request is not made for the purpose of delay. Rather, Defendants' counsel, Lauren Norton, is 36 weeks pregnant and going on maternity leave through the end of October 2025. The parties believe they have shown good cause for the extension request under *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992). Accordingly, the parties stipulate and agree to an extension of the remaining deadlines as follows:

1. Completion of all expert witnesses' depositions shall be extended from August 8, 2025 to **November 21, 2025**.

2. ***Dispositive motions***: shall be extended from September 12, 2025 to **December 19, 2026**.

3. ***Good Faith Settlement Talks***: Good faith settlement talks deadline shall be extended from July 25, 2025 to **November 7, 2025**.

DATED this 30<sup>th</sup> day of June, 2025.

MILLS & WOODS LAW PLLC

JONES, SKELTON & HOCHULI, P.L.C.

By s/ Sean Woods (w/permission)

By s/ Lauren D. Norton

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of June, 2025, I caused the foregoing document to be filed electronically with the Clerk of Court through the CM/ECF System for filing; and served on counsel of record via the Court's CM/ECF system.

s/ Gail Hardin